

**TWTC Issue 1****Billing Process: Errors**

Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.
3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.
4. Please return to Nick Linden by e-mail ([nicholas.linden@psc.state.wi.us](mailto:nicholas.linden@psc.state.wi.us)) no later than the close of business (COB) Friday, July 25, 2003.

Submitted by: **Time Warner Telecom**

Contact: **Pamela Sherwood**  
Telephone Number: (317)-713-8977  
e-mail: [Pamela.sherwood@twtelecom.com](mailto:Pamela.sherwood@twtelecom.com)

Subject Matter Expert (SME): **Jennifer Turso**  
Telephone Number: (303)-566-6013  
e-mail: [Jennifer.turso@twtelecom.com](mailto:Jennifer.turso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

Name: **Interconnection Trunk Billing**  
Brief Description: **SBC consistently bills TWTC for two-way interconnection trunk groups used by both SBC and TWTC, although the interconnection agreement clearly indicates that TWTC will not be billed for those trunk groups. SBC has failed to make a change in its system so that the trunks are not billed (zero rated), and every month TWTC has to dispute the bills.**

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for years, at least since 2000.**
2. How many occurrences and approximately over how long a period of time? **Over this period of time, we have identified the circuits as being billed on at least 3 different BANs.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC's system defaults to billed instead of zero-rated for trunks.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain. **SBC has agreed with our interpretation of the interconnection agreement, but has not made the system change.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. Every month in bill disputes.**
2. Was this issue escalated for dispute resolution? **No.** If so, when and in what forum?
3. Last known position of the opposing carrier. **SBC has applied credits for most of these trunks and the rest are in the disputes process.**
4. Were any bill adjustments made to resolve this issue? **Yes, but it takes months to resolve each one.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**TWTC believes SBC needs to make a system change.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**TWTC Issue 2****Miscellaneous**

Investigation into the Wholesale Billing Practices of  
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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**Submitted by: Time Warner Telecom**

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e-mail: [Pamela.sherwood@twtelecom.com](mailto:Pamela.sherwood@twtelecom.com)

Subject Matter Expert (SME): **Jennifer Turssso**  
Telephone Number: (303)-566-6013  
e-mail: [Jennifer.turssso@twtelecom.com](mailto:Jennifer.turssso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

**Name: Electronic Invoicing**  
**Brief Description: TWTC has requested a certain number of invoices be set up to default to electronic invoicing, instead of paper invoicing. Despite numerous requests, and updates to our CLEC Profile, SBC continues to send those invoices in hard copy – via paper.**

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for the last year. We first discovered it when we received our first EEL invoice in November of 2002 and it was sent in hard copy.**
2. How many occurrences and approximately over how long a period of time? **This problem involves at least 4 different BANs.**
3. Is it a recurring problem? **Yes. Even after we were able to get an electronic bill one month, the next month we received a paper bill for the same BAN.**
4. Your belief as to the cause of the problem. **SBC has not changed its system to default TWTC's requested bills to electronic billing. Perhaps the system for designating electronic billing is set to paper for TWTC.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. Every month when we get the paper bills. We have also placed several inquiries with our SBC account manager.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. We had a conference call with our account manager to discuss many billing issues for our local invoices, including this one, on June 18, 2003.**
3. Last known position of the opposing carrier. **SBC believes we need to update our CLEC Profile, although it has been reviewed and updated twice.**
4. Were any bill adjustments made to resolve this issue? **No.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of. The paper bill limits our ability to audit and review certain of the bills.**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**TWTC believes SBC needs to make a system change.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**TWTC Issue 3****Rate Issue: Backbilling**

Investigation into the Wholesale Billing Practices of  
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**Submitted by: Time Warner Telecom**

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Subject Matter Expert (SME): **Jennifer Turso**  
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e-mail: [Jennifer.turso@twtelecom.com](mailto:Jennifer.turso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

**Name: Collocation Billing**

**Brief Description: SBC and TWTC have been working on auditing SBC's collocation bills over the last several months. SBC claims that during the merger, billing data was lost and therefore, several sites were not billed. SBC is conducting an audit of TWTC's physical and virtual collocation facilities, and started back billing TWTC in October of 2002.**

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for several months. We first noticed back billing in October of 2002 and issued disputes for the October and November invoices.**
2. How many occurrences and approximately over how long a period of time? **This dispute has been ongoing since July of 2002 and involves at least 8 different BANS.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC claims to have lost billing records during the merger and is now attempting to reconstruct it.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **Yes. Interconnection agreement and/or tariff as it relates to how far back SBC can bill for its own mistake, although TWTC believes it has been billed for all facilities. Also at issue is what rates should be applied.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have issued disputes and had conference calls on the issue. We issued disputes in October and November of 2002, and still did not have a resolution of those disputes by February of 2003. SBC continued to apply late payment charges to those disputes during this time.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. In February, TWTC escalated this issue and SBC had responded to most issues by March of 2003 – but SBC simply denied the disputes and denied our disputes over the appropriateness of the late payment charges.**
3. Last known position of the opposing carrier. **SBC is conducting more site inventories and believes it can back bill.**
4. Were any bill adjustments made to resolve this issue? **Yes. After reviewing one site, SBC agreed it was billing in error in generating back billing charges, and credited TWTC.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

#### **VII. Relief Sought**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**Depending on the outcome of the audit and cooperation TWTC receives from SBC, Commission action/clarification may or may not be needed.**



*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**TWTC Issue 4****Billing Process: Errors**

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Submitted by: **Time Warner Telecom**

Contact: **Pamela Sherwood**

Telephone Number: (317)-713-8977

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Subject Matter Expert (SME): **Jennifer Turso**

Telephone Number: (303)-566-6013

e-mail: [Jennifer.turso@twtelecom.com](mailto:Jennifer.turso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

Name: **Application of Credits**

Brief Description: **SBC does not apply credits to bills as requested. At times, SBC fails to communicate regarding the resolution of a dispute, or to completely read the dispute, and only issues a partial credit. Then, we get billed to fix the billing problem that we have identified, which results in additional disputes being issued by TWTC.**

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem for several months.**
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC may not have adequate processes in place to respond to disputes and to issue credits to the proper BANs.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **Medium**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have had conference calls on the issue.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue? **The issue is to which BAN the credits are applied.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**SBC definitely needs a process improvement, and perhaps a PM is in order to track that the credit was issued to the disputed BAN.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**TWTC Issue 5****Need for Audit/Support Information**

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Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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Submitted by: **Time Warner Telecom**

Contact: **Pamela Sherwood**

Telephone Number: (317)-713-8977

e-mail: [Pamela.sherwood@twtelecom.com](mailto:Pamela.sherwood@twtelecom.com)

Subject Matter Expert (SME): **Jennifer Turso**

Telephone Number: (303)-566-6013

e-mail: [Jennifer.turso@twtelecom.com](mailto:Jennifer.turso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

Name: **E911 Rates**

Brief Description: TWTC is unable to validate the rates SBC is charging us for E911 in the interconnection agreement or any tariff. TWTC has asked SBC for the source of the rates, but SBC has failed to answer TWTC's request which has been pending for over 4 months.

Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem since March of 2003. We sent an inquiry to our disputes contact on April 18, 2003 about the rates.**
2. How many occurrences and approximately over how long a period of time? **This dispute involves at least 3 different BANs.**
3. Is it a recurring problem? **Depends on the rate validation.**
4. Your belief as to the cause of the problem. **Unknown.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **Yes – we can't validate the rates in either our interconnection agreement or any tariff.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have asked for source data on the rates, and then we were referred to our SBC account manager. We first asked for rate source information on April 18, 2003 and were then referred to our SBC account manager on May 5, 2003. Despite several follow-up calls and emails, we have not heard back from our SBC account manager.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum? **Yes. We requested a formal conference call with our account manager on June 18, 2003.**
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue? **Not yet. TWTC hasn't disputed the rates because the bills are confusing. SBC added new BANs that each appear to have one E911 circuit, and then SBC disconnected/moved those circuits to another BAN. The billing periods for those various BANs may or may not overlap and this also leads to more confusion.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**We need to understand SBC's billing processes for E911, as well as its process on the creation and movement of BANs before we can recommend a solution.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

**TWTC Issue 6****Billing Process: Errors**

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Subject Matter Expert (SME): **Jennifer Tursso**  
Telephone Number: (303)-566-6013  
e-mail: [Jennifer.tursso@twtelecom.com](mailto:Jennifer.tursso@twtelecom.com)

Authorized Representative: **Pamela Sherwood**

Name: **Application of Payments to Correct Invoice/BAN**

Brief Description: **SBC does not apply payments made by TWTC to the invoice/BAN that TWTC designates. SBC's payment center staff makes its own decision regarding what bill to apply the payment to, and in some instances, the payment has been completely misapplied to other TWTC BANs. Instead of correcting the credit to the correct BAN, TWTC is forced to accept a credit on the incorrect BAN and issue another payment.**



Please answer the following questions:

1. When this issue was first discovered? **This has been an ongoing problem throughout the first and second quarters of 2003.**
2. How many occurrences and approximately over how long a period of time? **This problem involves one local BAN and several special access BANs.**
3. Is it a recurring problem? **Yes**
4. Your belief as to the cause of the problem. **SBC may not have adequate processes in place to ensure that payments are applied to the appropriate invoices/BANs.**
5. Does this issue involve an interpretation and/or application of law, contract or tariff? **No.**
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low? **High**
7. Any other pertinent information?

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how? **Yes. We have had conference calls on the issue.**
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier. **SBC is aware that TWTC directs, on its checks, how to apply the payment.**
4. Were any bill adjustments made to resolve this issue? **The issue is to what BAN the payments are applied. When SBC applies a payment to the incorrect account, it bills us a late payment charge on the account we were attempting to pay, resulting in more disputes.**
5. Were any policies or procedures changed to address this issue? If so, what changes were made? **Not that we are aware of.**

*(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)*

**SBC definitely needs a process improvement, and perhaps a PM is in order to track that the payment was credited to the correct BAN/invoice.**

*(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)*

**A. Analysis of Issue**

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

**B. Prior Attempts to Resolve the Issue**

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail: